We speak up for fairness

Northwest Territories Ombud

An Ounce of Prevention

FAIRNESS IN THE INCOME ASSISTANCE PROGRAM

Special Report 02-2022

From the Ombud

This report is the result of the office's first "own-motion" investigation. "Own-motion" means that the investigation was started on the Ombud's initiative rather than because of a specific complaint. Ombuds often use own-motion investigations to look into systemic issues of unfairness and to make recommendations to address them.

These "big picture" investigations are important, because many people who experience unfairness do not come forward to make complaints, and because specific complaints do not always bring to light all the issues that may be contributing to a problem. Our goal with these investigations is to help authorities get ahead of unfairness before it causes more problems for citizens, and before it results in more complaints. As I often say to public servants, I would rather prevent complaints than investigate them.

One of the ways authorities can get ahead of fairness issues is by having a culture of continuously looking at how to improve their services. This includes valuing and welcoming complaints, which are, after all, free feedback. It also includes setting clear service standards and expectations, and ensuring staff have the support and resources to meet them.

Without a culture of continuous improvement and adequate resources, staff may react defensively to complaints, burn out, and/or resign themselves to never being able to meet expectations. Mistakes, accessibility issues, and processes that do not work might never be identified or fixed, so that the same problems keep happening over and over. This in turn leads to poorer service and outcomes for clients who depend on public programs like income assistance. It also increases the levels of stress and frustration for everyone involved.

In this investigation we looked at how ECE receives and responds to income assistance clients' complaints and concerns about service delivery, how it monitors service quality and looks for ways to improve, and how it supports its staff to provide impartial and people-centred service. Our 11 recommendations are primarily aimed at improving the accessibility, efficiency, accountability, and responsiveness of the process for income assistance clients to bring concerns to ECE's attention, and at ensuring income assistance staff have the support they need to provide fair service.

In the course of this investigation we interviewed nearly every ECE employee involved in the income assistance program. Without exception they were open, honest, and forthright. I would like to thank them for their thoughtfulness and candour. We have included several direct quotes from them in this report because we felt it was important to represent their perspectives in their own words.

I am encouraged that ECE has accepted all 11 recommendations and has committed to addressing them by September 2023. We will provide an update on ECE's progress in a future report. In the meantime, I wish them well with their efforts to improve the income assistance program.

Colette Langlois
Ombud

September 2022

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Introduction

The investigation that led to this report was "own-motion". This means that it was started on the Ombud's initiative and was not based on a specific complaint.

The investigation looked into how the Department of Education Culture and Employment (ECE) handles service complaints about its income assistance (IA) program, and the related issues of how it monitors and improves quality of service, and how it supports and trains staff to provide people-centred services.

In this report, we provide background on the IA program, describe the complaints procedures, service standards, and staff training and supports ECE currently has in place, and set out our findings and recommendations.

Principles of Administrative Fairness

The Ombud has a mandate to investigate "maladministration", or "administrative unfairness". Guidance on the principles of administrative fairness comes from the *Ombud Act*[1], administrative law, and from standards that legislative ombuds have developed together.[2]

Standards of administrative fairness can be grouped into three categories: fair decisions (what was decided?); fair process (how was it decided?); and fair service (how was the person treated?).[3]

This investigation mostly considered issues of fair service. Fair service includes having accessible, flexible, effective, and clearly explained complaint resolution policies; fostering a culture of ongoing quality review and continuous service improvement; and ensuring staff are appropriately trained and supported to provide people-centred service.

Ideally, public authorities are able to resolve most complaints at the frontline or immediate supervisor level, which is usually more efficient and less stressful for everyone involved. It is important that public authorities learn from complaints so that they can keep improving their services instead of running into the same problems over and over again. Authorities also need to make sure that staff know what is expected of

[1] S.N.W.T. 2018, c. 19, ss. 33(1).

[2] See, e.g., Canadian Council of Parliamentary Ombudsman (2022). *Fairness by Design: An Administrative Fairness Self-Assessment Guide*. Available at www.nwtombud.ca.

[3] For more about administrative fairness, see www.nwtombud.ca.

them, and have the time and skills needed to both prevent and resolve complaints about their services.

Complaint Handling Best Practices

Good complaint handling systems are efficient, accountable, and responsive, and benefit both the public and authorities. What the public wants is a user-friendly complaint system that allows them to be heard and understood, to be respected, and to get explanations, apologies, and/or action as soon as possible. Authorities benefit by resolving conflicts in a timely and efficient way, getting information that helps them make their services better, and improving their reputation and client relationships.

A good complaint handling system can:

- fix problems before they get worse or are escalated;
- provide better outcomes for clients who make complaints;
- help authorities understand their clients;
- improve relationships and interactions between clients and staff;
- increase both client and staff satisfaction;
- provide information to help authorities improve their services;
- inform decisions about future services and programs; and
- enhance accountability and transparency and strengthen public trust in the authority.

Effective complaint systems incorporate the principles of fairness, accessibility, responsiveness and efficiency. Effective complaint processes are user-centred, set out in writing, clearly explained, well-publicized, and easy to understand and use. They provide for:

- prompt acknowledgement of complaints;
- keeping the person making the complaint informed of progress;
- quick resolution of complaints by frontline staff wherever possible;
- a way of determining the facts and identifying options for resolving complaints that do not get addressed through a quick resolution process;
- a clear and informative response to the person making the complaint, including information about other internal or external review options if the person is still not satisfied;
- a remedy, if a complaint is upheld; and
- consideration of whether the complaint raises any systemic issues that need the authority's attention.[4]

[4] The information on this page is adapted from: Commonwealth Ombudsman (Australia). *Better Practice Guide to Complaint Handling* (2009) and (2021) editions https://www.ombudsman.gov.au/publications/better-practice-guides/Better-practice-complaint-handling-guide; and Ombudsman Western Australia. *Guidelines on Complaint Handling* (2020)

Background

Income Assistance (IA) Program

The purpose of the IA program is to support residents who need financial assistance to meet their basic needs, including food, clothing, furnishings, shelter, and utilities. ECE's website states that the IA program also "encourages and supports greater self-reliance to improve the quality of lives". The program is established under the *Social Assistance Act* (the Act) and regulations.[5]

All clients except those over 60 years of age or those with disabilities are required to enroll in a "productive choice" to receive benefits. Productive choices include activities such as wage employment, education and training, parenting, and traditional activities. Beginning in March 2020, all clients were automatically enrolled in a "wellness, self-care" productive choice to facilitate physical distancing during the COVID-19 public health emergency.

Program Delivery and Authorities

The IA program is delivered through five ECE regional service centres in Fort Simpson, Fort Smith, Inuvik, Norman Wells, and Yellowknife, and 15 community service centres. In some small communities that do not have an ECE office, Government Service Officers provide some program support, such as receiving and forwarding applications and documents.

Client service officers (CSOs) have the most direct contact with clients and are based in the regional and community service centres. A few CSO positions are "itinerant," which means that they go to different communities as needed. Each regional centre has a Manager of Income Security Programs who is the immediate supervisor of the CSOs in the region. Regional managers report to the regional superintendents for ECE, who report to the Assistant Deputy Minister, Labour and Income Security (the ADM). Regional managers also have an indirect reporting relationship to the Director of Income Security Programs (the Director) at headquarters.

The headquarters division has a policy, planning and information unit, which includes a manager of income security programs, two program specialists and a full-time trainer position, and a divisional finances unit. Both units support the IA program.

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https://www.ombudsman.wa.gov.au/Publications/Documents/guidelines/Binder-Complaint-Handling.pdf

[5] R.S.N.W.T. 1988, c. S-10.

The Director is appointed by the Minister and holds the statutory authority to administer the Act. CSOs are appointed as Social Welfare Officers under the Act after successfully completing required training.

In this report, we use the terms “regional manager” and “regional management” to refer to both superintendents and managers, in order to better anonymize specific comments and quotes. The term “regional staff” includes superintendents, managers, CSOs and administrative assistants. Similarly, we use the terms “headquarters staff” and “headquarters” to refer to the Director, ADM, and/or other headquarters employees.

CSO Roles and Responsibilities

Each client is assigned a specific CSO. CSOs explain the IA program and its requirements to clients, take applications, meet with clients regularly, review the information clients give them to determine what benefits they qualify for, and let clients know if any information is missing. Before COVID-19, CSOs worked with clients to develop productive choice plans and checked that they followed up on their commitments. CSOs also let clients know if they do not qualify for income assistance or if they have been cut off from income assistance for not meeting program requirements and explain the Social Assistance Appeals process.

Previous Reports

Auditor General’s Report - 2013

The Auditor General submitted the “Northwest Territories Income Security Programs – Department of Education, Culture and Employment” report to the Legislative Assembly in 2013. The main issue the report identified was that more than half of the client files examined did not meet key program criteria. The Auditor General made several recommendations, including clarifications to program policies and guidelines; increased monitoring, reviews and audits of client files; collection of overpayments; and staff training. The Department followed up with organizational changes and changes to its policies and practices to increase program monitoring and consistency.

Income Security Forum - 2019

In 2019, ECE hosted an Income Security Forum involving community organizations and clients. A “What We Heard” report followed the forum and identified 27 “priority solutions” within 7 themes. Themes related to client service were: making the program and its delivery client-centred; communications, and in particular the need for plain language information; resolving process issues such as lost paperwork; and trauma-informed and disability sensitivity training for staff. Since the Forum, the Department has produced a plain language Income Assistance Handbook, has started logging all incoming documents to better keep track of them, and has set up generic email addresses for most regional centres. Training in trauma-informed practice was planned for 2020 but was delayed due to the COVID-19 pandemic.

Current Program Review

ECE is currently undertaking a review of Income Assistance programs and released a discussion paper in 2022. The discussion paper indicates that ECE is considering developing a separate program for seniors and persons with disabilities as well as changes to the existing program, including the goal of self-reliance, types and levels of benefits, and the productive choices requirement. It is also developing a performance measurement plan for the new programs.

Investigation Scope and Process

What we investigated

- The fairness of ECE's process for resolving complaints by income assistance clients about service delivery. By "service delivery" we mean the kinds of issues that are covered in ECE's service standards, such as timely service, and treating clients with respect and integrity;
- Whether ECE fosters a culture of ongoing quality review and continuous service improvement in the processes clients go through to access income assistance, and in meeting its own service standards; and
- Whether ECE ensures income assistance staff are appropriately trained and supported to provide people-centred services to income assistance clients in an impartial manner.

What we did not investigate

- Program eligibility criteria, types and levels of benefits, and how benefit amounts are calculated;
- ECE's process for resolving complaints about decisions on eligibility and amounts of assistance, which can be appealed to the Social Assistance Appeals Committee; and
- Income Security programs other than IA, such as Student Financial Assistance and the Senior Home Heating Subsidy

Investigation Process

We reviewed the Act and regulations, applicable policies and standards, public information materials, previous reports including the 2013 Auditor General's report on Income Security Programs and the "What We Heard" report that followed the 2019 Income Security Forum, ECE's January 2022 discussion paper on the Income Assistance Program Review, staff job descriptions, case files from previous complaints the Office has received about the IA program, and a sample of recent staff performance measures. Between February and May 2022, we interviewed 43 staff, including 26 CSOs, 3 administrative assistants, all regional superintendents and regional managers, the Director, the ADM, one headquarters Income Security Programs Manager, and the Trainer.

Our Investigation

Process for complaints about service delivery

What do clients complain about?

In our interviews with IA staff, we heard that the three most common things clients complain about are:

- Being denied income assistance;
- Disagreeing with the amount of assistance; and
- Delayed payments.

The first two types of concerns can be appealed to a Social Assistance Appeal Committee. Delayed payments are a service delivery issue.

The Office of the Ombud has also received complaints from clients about:

- Receiving wrong or incomplete information from CSOs, for example, not being told that they could apply for assistance for furnishings, or being given inaccurate information about payments made on the client's behalf;
- Not getting responses to concerns raised with regional staff, or only getting incomplete responses or responses after a long delay;
- Costs or difficulty of complying with ECE's document requirements, for example, having to pay banks for statements, or, especially for clients with mobility challenges, having to pay for taxis to go to the ECE office to drop off documents in person.

These types of complaints are also service delivery issues.

Informal service complaint process – up to April 2022

The complaint process was informal up to April 2022. Staff consistently described this informal process as starting with the client speaking to their CSO about their complaint. If the CSO was unable to resolve the issue, the complaint could be escalated to the regional manager, next to the regional superintendent, and finally to headquarters management.

Because the process was informal, it is not clear whether or how consistently clients were made aware of these expected steps. In practice, staff reported that clients sometimes took their concerns directly to management or to their MLA without first speaking to their CSO.

Most CSOs said that, given the opportunity, they could usually resolve issues themselves by taking the time to explain or re-explain the process and policies to clients. If not, their regional managers could usually resolve the concern.

New complaint process – April 2022

ECE launched a new process in April 2022 for IA clients to voice concerns related to service standards. A Client Concern Form – Income Assistance is available online and in ECE service centres. The forms can be mailed or emailed to headquarters' Income Security Programs Division.

Clients can submit forms anonymously if they do not want to receive any follow-up. The form asks several yes/no questions and provides a space for clients to note any additional comments or concerns. The yes/no questions cover the topics of: whether ECE met its 2-day business standard for responding to the application; whether ECE met its 2-day business standard for issuing payments; whether concerns were raised with the CSO and/or the Manager and if so whether concerns were addressed in a timely manner; whether the client was offered the right to appeal if they were refused assistance; and whether the client would like confirmation that ECE received the form.

The form and information available on the website do not say what ECE's process will be for addressing concerns once it receives them. ECE's overall service standard, which applies to all programs, is that clients will receive a response to concerns within two days, and that the concern will be resolved as soon as possible. Headquarters staff advised us that they are waiting to see how the new form is used by clients before finalizing the process.

Staff views on complaint resolution

The general consensus of the staff we interviewed was that the underlying reason for most complaints is clients misunderstanding something about the program. For example, the 2 -business day standard for responding to applications only starts once clients have submitted all the required information. Some clients complain about delayed responses or payments before they have provided that information to their CSO. The term "budget surplus" and the rule that loans are counted as income were also mentioned as particularly difficult for some clients to understand.

Importance of a timely and efficient complaints resolution process

Regional staff overall expressed a strong preference for having an opportunity to resolve service delivery complaints first before they are escalated elsewhere. Ensuring a timely resolution for the client, and efficiency were the most common reasons given for that approach.

Staff recognized that some concerns are best handled at the political and/or headquarters level, for example, complaints about policies that staff do not have the discretion to change, questions about policy interpretation, or situations where a client has complained about a staff member's behaviour, and the regional management has not adequately addressed the concern. However, they felt that for most service complaints, they were in the best position to find a quick resolution for their clients.

Complaints that make their way back to a regional office through headquarters, either via an MLA and the Minister's office, or through other channels, require staff to prepare "bring forwards" (also called "BF"s). Once headquarters notifies a regional office of a BF, regional staff prepare written notes summarizing the situation and what happened, and including any specific information requested, and email the response back to headquarters. Headquarters staff then use the BF to prepare briefing notes for the Minister's office as required.

Staff voiced concerns that this process is time-consuming and affects their ability to meet service standard deadlines for other clients. Complaints that follow this route take much longer to resolve.

For example, we heard that it was not uncommon for regional offices to hear about a complaint for the first time through an MLA. One regional manager advised us that of the five most recent complaints to the MLA, not one of the complainants had spoken to regional office staff first, and three of the five had not even applied for the program. Each of those complaints, however, required a full response.

Another regional manager told us about a complaint to an MLA that a client had not received his income assistance. The client had provided 6 different addresses to the CSO and then left the office without completing the application. The CSO had been trying to contact the client but had been unable to reach him. The manager said to us:

> *I told the Director we just need to talk to him, that's all that is holding up his payment. Could the MLA just tell him to call us? But once it has gone to BF, you have to go through the whole formal process, and it ends up taking longer for the client.*

The following comments elaborate on the impacts and challenges of preparing formal responses to complaints from the perspective of regional staff:

Think about the impact in the small communities. We have one CSO who does three communities. She has no administrative assistant. So for her to spend hours on responding to a [request from headquarters for a BF] *– who is handling the rest of her clients in the meantime?* - Regional manager

The quiet clients are pushed aside – it's so frustrating. But we have no choice to drop working on their files, to respond to [headquarters about a] *complaint. That's the frustrating part – I am working on all the aged and disability clients who are depending on me to get to their file. And a client who didn't apply until the last second, will call the MLA the very next day to try and get their cheque as quickly as possible. Then there is a big process, you have to drop everything else to get on that BN. What is frustrating to me is that it is the clients who don't complain that end up being pushed aside.* - CSO

My colleague … had a client who was giving her a hard time steady steady steady. And the client would always call HQ [headquarters] *on her and HQ would come back at her. She didn't know what to do because she was scared to ask the client for the documents they needed to bring in. I told her, you have to ask for the documents, they are required. But she said, 'No, if I ask, they will complain about me.' The client kept complaining and we were doing briefing notes, over and over. They just needed to bring in the documents. But it left us feeling frustrated because HQ just let it happen over and over.* - CSO

A CSO gave an example of a client who came to her about having received a disconnect notice. She promised she would resolve it and spent several hours doing so, before calling to let him know it was taken care of. However, soon after returning to her other files that needed cheques prepared by the deadline, she heard from her manager that a BF was needed to respond to a complaint the client had made to the MLA earlier in the day. She found it hard that despite having already resolved the complaint, she still had to drop her other files to write the BF.

We heard several similar stories. We also heard that some complaints that go to regional offices through headquarters are difficult to respond to formally because they are vague, for example, “the CSO gave me the runaround.”

Importance of clarity about the difference between service issues and appealable issues such as eligibility and amounts of assistance

One regional manager noted that some client appeals to Social Assistance Committees are really about service delivery issues, which the Committees do not have the power to deal with. This increases clients’ frustration, because they may wait weeks for the result of their appeal, only to find out that their concerns will not be addressed. The manager suggested that it would be helpful if there were a way of screening appeals for these issues to let the client know about alternate processes and/or to let the regional office know about concerns so they can follow up.

Another suggestion from a manager was to establish a clearly written, plain language complaint process flow chart showing where to bring different kinds of complaints.

Other suggestions from regional staff for improvements to the complaint process

Two regional managers suggested establishing a client advocate position to help clients with complaints and appeals, similar to the role of the Workers’ Advisor for Workers’ Safety and Compensation Commission clients.

Another suggestion was to create a checklist tool for MLAs’ offices on common questions and concerns that might avoid the need for a BF in some cases.

Quality review and continuous service improvement

Service Standards

> *I like that ECE has client service standards. I like that clients know what to expect. When I worked at* [another authority]*, we didn't have deadlines, and the process wasn't communicated to clients. -CSO*

ECE has Department-wide service standards, as well as program-specific standards for IA and other programs. The Department-wide service standards cover the topics of timely service (in-person, telephone, and correspondence), quality service (welcoming people and treating them with respect and integrity, following policies and procedures, and having staff with the skills, knowledge and abilities to provide quality service), protection of personal information, and issue resolution (timelines for responding to and resolving concerns). The IA standards cover the topics of general communication, applications, and the appeal process. The first two topics mainly address timelines for keeping appointments, responding to general messages and applications, and issuing payments.

Both standards are written in clear language and are published on ECE's website. The IA standards were posted in the larger ECE offices we visited, but not in all of the smaller community offices, possibly due to space limitations. Staff were unanimous in telling us they are confident that most or all clients are aware of the IA standards, in particular "the 2-day standard" for responses to applications and payments, and that clients often refer to them in discussions.

Regional staff understood the standards as a major priority and focus of ECE. In addition to meeting the service standards, many CSOs told us they were committed to always take calls and meet with any client who comes by in person outside of an appointment time as soon as possible.

Challenges meeting service standards

Some regional staff voiced concerns that the standards, and particularly the 2-day standards, create unreasonable expectations that set clients up for disappointment and set CSOs up for failure. For example, clients may expect that if they drop off their documents on a Friday afternoon the payment will be in their account first thing Monday morning. They may also expect the 2-day standard to apply even if they have not provided all of their documents.

Another challenge regional staff identified is the interaction between the standards and already heavy workloads (discussed in more detail below), and the impact on both client relationships and accuracy. Staff told us the standards contribute to burnout from trying to meet deadlines, more mistakes due to having to rush, and less time for interacting with clients and building relationships. Some managers also noted that delays are occasionally due to having to wait for a response from headquarters, or bank processing times. Unfortunately, even when delays are caused by factors outside of CSOs' control, clients may still have the impression that it is their CSO who has failed to meet the 2-day standard and complain about them.

The following comments elaborate on the impacts and challenges of meeting service standards from the perspective of regional staff:

CSO's are so focused on pushing out approval and responses and payments by the deadline that they are forgetting they are dealing with someone with high needs who might need more time for communication and the CSO may come across as abrupt – the clients don't get the interactions they need and may be frustrated. – Regional manager

[CSOs] are working so much overtime. Even though we have a very strict policy for approving overtime, but how can we set these service standards without giving them the overtime they need to make it possible to meet them? That causes them to burn out. I feel that morale is very low. - Regional manager

It makes pressure to meet the deadline that can cause you to rush. There are so many things we have to check off, be attentive to. Rushing to make the two days, it can happen that things get missed, that mistakes get made. It's so pressured. -CSO

Two days is a lot of pressure. CSO's are stretched out thin enough as it is. I've seen CSO's check out because they are so overwhelmed with all the pressure. The clients know the service standards and can be very aggressive and rude. They will be there in exactly 48 hours, to the hour, and say that their cheque had better be ready… if we are short-staffed and the CSO's can't complete it, they feel bad that they are failing in their job. I get it that timing is important, but sometimes it is doable and sometimes it is not. – Regional manager

Our CSO in [community] *represents three communities. She has no admin support. She will come to me and say, 'All I do all day long is answer phones because the phone rings all day long. But then I can't get to the processing I need to do to get the client approved in two days. But if I don't answer the phone to try and get the work done, they will think the office is closed.' So she is in a position where either way, she will miss a service standard – and either way, if she doesn't get the process done or if she doesn't return a call promptly, there will be complaints.* – Regional manager

Tracking Performance

ECE does not currently have a systematic way of tracking how the IA program is doing on meeting its standards or responding to complaints. Headquarters advised us that they can check whether timeliness standards have been met for an individual client file but cannot produce overall reports. In some regional offices administrative staff are manually tracking data such as call-back times.

Headquarters management told us they recognize that the lack of ability to track overall performance on service standards is an issue. The need to develop a performance measurement plan is identified in the 2022 Income Assistance Program Review discussion paper.

Training and support for staff to provide people-centred services in an impartial manner

Training and professional development

I found the CSO conferences we used to have very helpful… it's a chance to debrief with colleagues, getting feedback. That is really important to me. It was also our chance to talk to HQ about our experiences. I really miss those conferences. -CSO

A lot of our clients are disabled, staff need to have a feeling for that… Many have mental health conditions, often undiagnosed. Some of our clients have problems dealing with someone in authority because of that. Staff don't know how to deal with someone in that situation, how to talk to them. They need more training. -Regional manager

All CSOs undergo two weeks of mandatory training at the start of their appointments and take refresher training every two years and/or after being on leave for a year or more. While the training mainly covers policies and procedures, it does include some discussion of client service topics such as customer service, effective referrals, and emotional intelligence. The GNWT's Code of Conduct and the Code of Ethics for Income Security Employees are also covered.

All CSOs are also required to complete one-time training in:

- the GNWT's Certified Service Professional program (6 hours – focuses on teaching a citizen-centred approach and public service delivery fundamentals);
- mental health first aid;
- motivational interviewing; and
- non-violent crisis intervention.

Many staff made positive comments about the annual in-person conferences headquarters has hosted in the past which they have found very helpful for networking and professional development, especially for new CSOs and CSOs working in one-person offices. Staff also found regional "mini-conferences" and meetings valuable. The 2020 and 2021 territorial conferences were cancelled because of the COVID-19 pandemic, and all training moved online during that time. There have been few opportunities for CSOs to meet each other in person since 2019. ECE advised us that they are planning a territorial conference for the spring of 2023.

Headquarters advised us that they had planned to provide training in trauma-informed service delivery during the 2020 conference, and now plan to include it in the 2023 conference.

ECE has arranged for presentations from the NWT Disabilities Council but has not provided training on working with clients with disabilities. Some staff told us they would like more training in how to help clients with "invisible" disabilities like addictions and mental health conditions navigate the system.

Other professional development topics staff and regional management suggested were:

- how to handle unreasonable client behaviour (e.g., non-stop calling and emails);
- conflict resolution techniques that help sustain and improve client relationships over time (one CSO noted that past trainings such as "verbal judo" were aimed more at one-time conflicts);
- empathy, active listening, and relationship building;
- complaint handling; and
- personal wellness and stress management.

Workload

Workload was the issue regional staff mentioned most often as compromising their ability to provide good client service, meet the program's two-day standards for response times and payments, and maintain personal and professional well-being. One regional manager also remarked that more training would be difficult to manage with current workloads.

> *I have had jobs in the past that were busy, but never like this, the Client Service Officer position is a whole different degree of busy. I have never seen a job where it is the norm that there is no way you can do the job in regular hours. I have had heavy caseloads in other jobs, but never anything like this.* – CSO
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> *The CSO's have approximately 100 people in their caseloads. How are they able to respond to 100 people all within 2 days, especially during delivery when everyone is reporting and you need to process 100 applications and follow up on missing documents and returning calls?* – Regional manager
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> *The hours are not enough. I don't get enough time with clients, I have to rush. I'm trying to be a good service to the community, but it is hard with part-time hours.* - CSO
>
> *I think a reasonable case load would be 50 per person – and they have like 90 each.* – Regional manager

There is no standard caseload set for CSOs. Staff in every region, though not in every community, told us they thought caseloads were too high. This appears to be a longstanding issue: the 2013 Auditor General's report also mentions staff concerns that high caseloads were having an impact on program delivery and leaving them little time to work with clients needing more attention.[6] At that time, according to the report, the average CSO caseload was 34 files per month, although CSOs in some communities were handling between 65 and 119 files per month.

Caseload numbers do not tell the whole story. Some CSO positions are part-time, and cannot be expected to handle the same caseload as full-time positions. Further, as several staff pointed out, clients have different levels of need for time with their CSO to understand and meet the requirements of the program. Two regional managers suggested a need for additional CSOs and/or liaison workers who could specialize in helping clients with more complex needs overcome barriers to accessing the program. The North Slave Region recently

[6] At pp. 29-30.

dedicated one CSO position to work with all clients assigned to Integrated Case Management, who generally have complex needs. There were many positive comments about this pilot project.

Other issues staff mentioned as contributing to workload pressures were lack of administrative support in some offices, the requirement for CSOs to access clients' Canada Revenue Agency (CRA) information, and lack of relief support, especially in communities with only one CSO.

The following comments elaborate on workload challenges from the perspective of regional staff:

I see our CSOs trying. But they just don't have the time to see the personalities. If they had more time they would be able to get to know the clients…so they wouldn't react defensively. Some of the complaints I have had, 'she was dismissive to me, acted like she just wanted me out of the office' – I know the CSO was just struggling to get to all their workload… the CSO is just thinking, 'I can't sit here and talk because I have so much paper to get out'. – Regional manager

If you try to do it in, say ½ hour per file – on average, you're already putting in 50 hours per week – but you only have 37.5 hours to accomplish that in. – Regional manager

The phone is pretty much constantly ringing in my office while I'm here. I only work half days and it's not enough, it's so intense. I am always so flooded, I can't even take a few minutes to breathe. - CSO

Our vulnerable clients take up a lot of the CSO's time. Filling out forms can be really hard for some of these clients. It can take hours for one client, but meanwhile the phone is ringing with other clients. - CSO

I find it really overwhelming to be talking with a client and trying to focus on them, and the phone is ringing at the same time… I don't answer the phone if I am with a client in person. But then the person calling doesn't reach me, and they will call the Regional Office or the MLA because they think I am not there. – CSO

You are very limited to take annual leave because they are so limited for workers… for wellness, how do we take care of ourselves if we can't take sick leave, annual?…There are stressful days, I feel tired, overwhelmed. – CSO

I work a lot of hours for free. I stay to get work done for the sake of my own sanity because it can't be done in regular hours…There is stress because we are always short-staffed. And when you are covering for someone who is away it is even worse. And when you are stressed and dealing with clients who are stressed, it's a challenge…. You just keep breaking. -CSO

When CSO's are stressed and tired and calls are coming in non-stop – that's when mistakes happen. – Regional manager

Clarity of expectations

One way authorities need to support their staff to provide people-centred service is by setting clear expectations. Clear expectations come from a combination of legislation and policy documents, job descriptions, individual performance goals, and leadership from managers. When these sources send conflicting messages about program goals and priorities, it becomes difficult for staff to make judgement calls in their day-to-day time management and dealings with clients.

Clarity of program goals

ECE's January 2022 Discussion Paper indicates that ECE is contemplating a shift in perspective from the current goal of the IA program, which is to help Northerners to become self-reliant. The Discussion Paper notes this has caused difficulties because there has never been a common understanding of what is meant by "self-reliant". The Discussion Paper states that ECE "is considering updating the goal of the IA program so that it is focused on assisting clients to improve their personal well-being by ensuring their basic needs are met."

> *When I was training for this job, I was worried because I had always heard the CSO who was here before me was very strict in applying the requirements…but it was a different CSO training me, and she told me, 'Remember that people are here because they need help, there is no employment for them, they have no way to meet their needs, and you are here to help them'.* -CSO
>
> *You feel for the clients, but you have to follow the rules. The policies are very rigid, and I understand they need certainty, but we are trying to deal with people's complex lives and the issues and problems they have.* - CSO

Our interviews with CSOs and managers confirmed a lack of common understanding of the goal of self-reliance. This results in different interpretations of what "good client service" means.

For some CSOs and managers, the goal of self-reliance means that good client service should focus on ensuring clients are taking personal responsibility to know what information they need and how to comply with the requirements, to gather their own documents and information and bring it in on their own. They also focus on the importance of ensuring clients establish and comply with all aspects of their productive choice. The following staff comments reflect this understanding of self-reliance:

> *It's too much focus on personal touch on what is a financial situation. Your banker, your mortgage broker…does not keep calling you to say, "Hey you still need to bring in these documents to get your money…. I think the issue is that we are not social workers. We aren't here to solve people's problems. We are the financial aspects of their lives. But people think we do more, they don't understand, or care to understand, the limits we have.* – Regional manager
>
> *I find it defeats the whole purpose of Income Assistance – they tell us, you are supposed to help the client become self-reliant. But every time they add more things we are supposed to get for the client now, rather than the client bringing it. Responsibilities are taken away from the client and added to the CSO's. It helps the client, but then they get angry about the things they still have to do.* - CSO

For other CSOs and Managers we spoke with, the goal of self-reliance is to ensure clients can get the assistance to meet their basic needs, which may require providing them assistance in getting the documents they need, giving them multiple opportunities, and/or showing flexibility and creativity in what is accepted for meeting the requirements. The following staff comments reflect this perspective on self-reliance:

> *I feel like they never sit with the CSO's and say, will this work for your clients? I feel like the policies are creating more red tape – setting up more hoops for the clients to jump through. It shouldn't be so hard. We have to remember if clients are refused, they can't survive.* - CSO

> *When they first started the income assistance program, it was all based on southern programs. It was not based on northern culture. … My perspective is: if I make a mistake, I still get my paycheque. But if a client makes a mistake, they don't get their cheque.* – Regional manager

> *We get more paperwork than they require in other provinces, they don't ask for all this stuff. We get them signing 9, 10 forms, it makes some of our clients – we put them on the phone to CRA – they are crying, they can't read, they can't write. … There are some people who tell me – I won't apply, it's just too much, all that paperwork. It's a lot of work for them. The power bills. They are supposed to bring them in, why can't we get them to email or fax that to us every month, so much easier and faster…. Or last month, [the housing authority] won't send rent assessments directly to us. We have older clients, it is hard for them to walk, but they have to go down and get it for themselves.* - CSO

Discretion to accommodate client needs

A related issue is the extent of the discretion CSOs and managers have to accommodate individual client needs and to address mistakes. We noted there is some tension evident between the Income Security Programs *Code of Ethics* (discussed below), which requires that staff "promote the general welfare of society and the development of people, their communities and their environments, and work to effect social change for the overall benefit of citizens of the Northwest Territories," and the limited discretion available to program staff under the regulations.

Some staff felt that more discretion in the program would help them provide better client service:

> *You have to learn to adapt to your clients. We have a client in his 40's, with FASD. You will ask him did you work this month. He will say no. He gets his IA benefit. Then you find from his bank account when he reports, he earned a few hundred dollars. The policy says that is failure to report income which is supposed to cut them off for the next 2 months. But he's not doing it deliberately. If you ask him, he will say, oh yeah, I forgot. So I will just tell him, OK, here is your cheque, just remember to bring in your pay stub.* – Regional manager

> *The biggest thing that would help with client service – there are a lot of places in the regulations, where if they could just change 'the Director shall' to 'the Director may' … give that discretion – that would give room for a consideration of humane issues . Because we encounter unique situations all the time where the mandatory 'Director shall' results in – looked at compassionately, not serving the clients very well…..As an example, we recently had [an elderly] client, so not required to work. In the past year, he had lost 2 of his sisters and one of his brothers, and then his son died down south, so he went down there to deal with his son's passing. And there is nothing in the regulations that would allow us to keep paying him income support while he is down there. The regulations would only allow that if he was down there for medical reasons. If the regulations said "may", the Director could say I think it is justified to help him out. He's been through too much.* – Regional manager

Some regional managers also felt that more discretion could be transferred from headquarters to the region to allow for faster resolution of issues in some cases:

> *Our program does not allow us to make decisions that might help the client…..An example is – we want to get someone exempted from having to be on the public housing waiting list to get paid. You have to get an approval from the Director for that. But they have needs right now. It should just be automatic that we can pay them right now and give them another 60 days to get on the list. Nobody ever plans to need income assistance. We shouldn't have to get Director approval and all the extra days it takes.* - Regional manager

> *A really big thing they could do to improve client service, is give more authority to the region. Locally for all CSO's, if we didn't always have to go to the Director for approval. If the Director could delegate more to the Regional Superintendents and Managers – then they can make decisions that are appropriate for their region. And CSO's who have a unique situation where they need to get Director's approval for a client, instead of having to wait the extra time to deal with HQ, could go right to their regional level and get quicker approval.* – Regional manager

> *There are a lot of things that need to change to help clients. And some of those things I see as easy changes. As Manager, I have very limited decision-making. But people need to be paid yesterday – not three or four days from now. But when we have to go to the Director for a decision, it takes several days.* – Regional manager

Ability to correct mistakes

Several CSOs raised concerns that the regulations do not give them the flexibility to help clients when the CSO makes a mistake. A common example happens when power bills are not paid on time, which results in late fees. Sometimes CSOs said this was the fault of clients not bringing in their bill on time, however, sometimes CSOs said they could not locate bills that clients said they had brought in. Staff told us that sorting out these issues takes up a lot of time and is stressful for both staff and clients. Some CSOs were under the impression that regardless of whose fault it is when utility bills are not paid on time, late fees are not included in the basic needs that are covered by the program, so clients cannot get help to pay them. Headquarters staff clarified that IA can cover late fees if they are the result of Department error.

Other examples we heard about happened when CSOs mistakenly gave cheques to clients that should have been paid to a third party for essential needs like housing or firewood. In both situations, the client spent the money and had no way to repay it, nor could the CSO issue a new cheque to the landlord or contractor to cover the expense for the client. In both cases, it resulted in a very difficult situation for a vulnerable client, who still owed the money for rent/wood, and in addition had to repay ECE for the amount they mistakenly received. The CSOs involved reported feeling a lot of stress and guilt at the impact of their mistake on the clients.

Ethics

Program Delivery staff must sign an Income Security Programs Code of Ethics Policy (the "Code") in order to be designated under the *Social Assistance Act,* in addition to the *Code of Conduct* which all GNWT employees must sign. The Code of Ethics is reviewed with CSOs during their statutory training.

The Code sets out clear guidelines for identifying and managing conflicts of interest. There was consensus among the staff we spoke to that this process works well, while still allowing people in small communities who have a connection to the only CSO to receive some services in person.

The Code also requires that staff: use accurate and respectful language in all communications with clients; provide all clients with complete and accurate information regarding the extent, nature and limitations of any services available to them; address all inquiries and complaints in a timely manner; and serve as responsible role models for clients, staff and the community. Although we did not hear any concerns about CSOs not understanding or following the conflict of interest provisions, we did hear a handful of comments from staff who said they had heard colleagues be rude to clients, or believed that colleagues were not taking enough time to give clients full information about the program.

> *A challenge is maintaining boundaries. One of the things I find the hardest is asking people personal questions that feel like none of my business, but I have to ask. At first I really didn't think it was right for me to be asking about someone's relationship, but now I understand its necessary for the CSO role. I have to ask – are you in a relationship or not – personally I feel it is none of my business, but as CSO, I have to ask that.... Sometimes you have to call clients on things. Its hard when you know from being in the community, they live together, but they apply separately for income assistance with you.* - CSO
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> *We live here and we know things, but what can you do? It's really hard, and you try not to place judgements on people. For me personally, I know I get really frustrated when people lie to me, but I can't carry that.* - CSO
>
> *I think that sometimes you have to turn a blind eye to what you see in the community. Because it is outside work hours, outside of your job. But if you see something in your private life that could affect their eligibility, it is hard.* – Regional manager

Boundaries can be especially challenging for CSOs in small communities to navigate. They are likely to run into their clients in other settings, and to know them well even if they do not have a close enough relationship for it to be considered a conflict. CSOs have to ask about very personal details of clients' lives, such as their finances, their relationship status, and whether they are attending counselling sessions. They may also easily become aware of information about a client that the client has not shared with them, such as that they have gotten back together with their partner or won money at a bingo. This is one ethical issue that CSOs were not certain how to approach. Some staff seemed to believe that if they had outside knowledge about a client they had to raise it with them; others felt that they should ignore what they heard elsewhere in the community, rather than bringing it into their CSO role. Some CSOs mentioned that they found it helpful to discuss these kinds of situations with colleagues to work out what to do.

Job descriptions and performance measures

Job descriptions set out the purpose, scope, responsibilities and knowledge, skills and abilities for each position. They signal the key expectations for each position and what is most important for employees to focus on. They also impact employees' pay levels.

Most current CSO job descriptions date back to 2010, although some have had minor updates more recently. The purpose of the positions refers to a “Service Management Approach” to delivering income security programs. Responsibilities focus on the program administration and delivery aspects of the role: determining client eligibility, providing benefits in accordance with legislation and policy, using the service management approach (interviewing clients, assisting them to establish development plans and providing information), and working with other community groups and agencies. Relationship-building, explaining complex program rules in plain language, supporting clients to meet program requirements (e.g., one CSO explained to us how she helped clients get set up with banking through their phones so they would no longer have to go to the bank in person and pay for printed statements), and conflict resolution, all of which many staff described as significant parts of their workdays, are not mentioned within their responsibilities.

Headquarters advised us that they intend to review job descriptions as part of the Department’s IA Program Review.

Annual employee performance appraisals identify objectives, measures and actions to improve performance in the coming year and also signal to employees where they should focus their efforts. In the sample of appraisals we reviewed, we noted an emphasis on managing caseloads, compliance, and meeting program standards. Only a few objectives emphasized the “people” side of client service: one CSO had an objective of building rapport with clients, four had an objective of strengthening communications, and one had an objective of “continuing to improve on the level of service provided to our clients while remaining respectful and understanding of their situations”.

Support for Staff Well-being and Stress Management

Headquarters and regional managers told us they were aware of the mental and emotional challenges of CSOs' jobs. Some managers said they sensed that some CSOs were burned out and jaded, and that this might affect their client service. Stressors in addition to the heavy workload discussed above, include the emotional impact of not being able to help some clients, seeing some clients take advantage of the system, navigating personal and professional boundaries, especially in small communities, feeling blamed for outcomes that were not necessarily their fault and at the same time not feeling appreciated for their efforts, and abuse and harassment from clients.

While all managers showed concern for employee safety and well-being, they also recognized the limitations of what they could do. For example, if a client complains about a CSO on social media, there is no way to respond, as this would violate the client's privacy. Managers can do little to intervene when harassment or abuse happens in the community outside of the workplace. One CSO told us they felt especially vulnerable working alone in a small community. Although the GNWT has an employee and family assistance program (EFAP) that offers counselling to help with burnout and workplace stress, one manager said that it was not adequate to help employees and had too long of a waiting period for appointments. Another regional manager felt that they did not have support from headquarters to set firm expectations and boundaries with clients who were verbally abusing staff.

In my own community, as a front line worker, you can't disconnect yourself from it. And people don't separate you from your job – they don't look at you after 5 pm and see you as a person. - CSO

You go out shopping – 'where is my cheque?' – you get the calls at home too. There is pressure wherever you go. – Regional manager

It does get hard. I would say it has turned me into a hermit because I try to keep apart. -CSO

Outside of work, I don't like grocery shopping, or socializing, because clients will approach and want to talk about their case. I used to like going to dances, but I don't anymore. And if they approach you in public and are upset – you can't tell anyone about it. My children will say, 'why did that person say that to you?' and I can't tell them that it is from work, because of confidentiality. It can also be hard for me to access services myself when I need them. -CSO

People don't understand, it's policy holding us....It's a tough spot for us, as much as we would love to help sometimes we can't. And it breaks your heart. There are a few times I have sat here and cried because I couldn't help families with kids. What do you do? How do you leave here, feeling that? ... There are times I can't help and I wish I could – I wish I could just run out and buy something for them. - CSO

Several staff mentioned that one thing that might help reduce stress and burnout would be more acknowledgement of what they were doing well, rather than what seemed to them a constant focus on complaints and what is going wrong.

I have so many CSO's who consistently went above and beyond to help clients, but the good work they do never gets recognized. CSO's only get feedback about the negative comments and complaints. It affects their morale....We know people need to exercise their rights to complain. But that is all the CSO's hear, and nobody ever recognizes the good work that they do. I see how it grinds them lower and lower. I see how hard they work and I wish they could get recognized for it. – Regional manager

We do work really hard for client service, and it is hard work, it is emotionally draining, you hurt for all the trauma that you see. But there is never any recognition of that. A little bit of acknowledgement or appreciation, would help us get back up there. – CSO

Staff perspectives on what is working well

During our investigation, IA staff shared success stories and thoughts about best practices. We heard many examples from staff of what they saw as working well to support good client service, particularly in the areas of relationship-building, communications, and internal support from colleagues. We have included a sample of their comments below.

Building relationships with clients

For me it is really rewarding to see clients who a year ago wouldn't even look at me, and didn't want to come to the income assistance office, and now are walking in waving at me with a smile on their face. Just knowing they are comfortable enough to do that, I feel I have done my job. – CSO

I feel like, the clients come in and they know they can be helped. A few years ago when I first came, we had a lot of angry clients. But I don't see that as much anymore, I think there has been relationship-building… I think it works better with our clients now, the office is more welcoming. – Regional manager

What works well is when I meet face to face with clients… and we have those little conversations, talk about what their plan is, giving them a little bit of guidance. – CSO

Building a relationship with your clients is not hard personally, but you have to put in your time and commitment. We had a previous CSO who would see clients in less than two minutes – would just take the documents from them, that's it. And a lot of hostility from clients started to build. – CSO

Because I am born and raised here, I know where they are coming from. I like my job, I like my clients. I want them to know I am here to help them. Me being Indigenous, that really helps. I know the community, I know there is no employment here, I know how badly people need this help. I just try to be as helpful as I can for people. – CSO

I had one client … and every month, I was pulling my hair out, so frustrated, and I didn't want my emotions to get in the way of helping him. So I used a technique a friend told me about once. Every month, when I meet him – I pretend it's the first time I have ever met him. I started doing that and it got easier and easier. That way I don't bring in all my past experiences or any of my junk in with me, and I can just focus on what I need to do to help him. – CSO

Communicating about the program

Many staff commented that the most important thing was to tailor communication to individual clients. They mentioned the need to repeat information, the importance of speaking the client's language, and the need to use accessible language to explain difficult program terminology. Some CSOs found it help to write things out and show clients visually. Other CSOs mentioned that it helped to read documents over with clients or offer to read them out loud, as clients who have trouble reading may not feel comfortable disclosing that to their CSO. Staff also spoke about the need for patience and understanding when talking to upset clients.

Communicating about the program: examples of what works

I know all my clients. I speak their language. That is the most important thing, to speak their language and to speak in their way. - CSO

There is so much information clients have to take in. So when I leave a client at the end of an interview, I always tell them, because it's so much information, just give me a call if you aren't sure. I will answer any question, there is no such thing as a stupid question. Because there is so much information and you are just throwing all this on them, I know I wouldn't be able to grasp all of it. And they may have additional barriers that make it even harder. – CSO

The terminology can be hard for some clients, you need to be aware. You tell them you need a Notice of Assessment, they won't know what that is. So I tell them, "it's that paper in that brown envelope that you get after you do your taxes" - and they are 'oh, OK!' Now they understand what I am asking them. – CSO

For some, a phone call might be the best way to ensure they get something. But for others, a call will go in one ear and out the other and its better I do it in writing so they can visually see. And I may need to space it out with lines to make it more visual. – CSO

I do a lot of paraphrasing. Like "shared accommodations" – most of my clients will not know what that is. I will walk them through it. I find it helps if I can show that to them, I will show how it comes from their tax paper and the number of people in the house. It's the same with power bills... I will do the math right in front of them to show what portion of the power bills we are going to pay. I do that because I had miscommunications in the past, where people got upset I wasn't paying the whole bill. But if they know why and see the math, it helps.... I always have paper and pen. I will write it out as we talk.... something they can look at. – CSO

Communicating with clients who are angry or upset

I had a gentleman who felt that I was being too nosy. 'You always want to know where this money comes from, where that money comes from.' So I got our policy book and I showed him where it said, anything over $300, I need a note from that individual. He had felt I was picking on him. So I showed it to him, 'I am just showing it to you so you can see why I am asking.' He said never mind, he didn't need any help that month and just walked out. So I left it for a day, let him cool down, then next day I called him to say, 'I just wanted to check with you, see if you still wanted to get that note. We are here to help – but we do have a policy to follow. So I will put it back in your hands.' And he decided to get the note. I know there are times when clients – it happens in everyday life, we get upset, we say things that we regret. So if you give someone a day to settle down, calm down, the next day will be better. Give them time. – CSO

A client got really aggressive with me when I had to deny him... I explained why I had to deny him in my language....And I think it was using the language that helped. He agreed to go...I think it is because of the language that it helps me calm them down. – CSO

Support from colleagues

We have a good team of CSOs who support each other. We all know each other's clients and can often help with advice. My co-workers are my #1 support. I can ask them for ideas or just vent to them. – CSO

The Buddy System is really helpful. If I'm stuck, I will call my buddy … and I am a buddy to someone too. We will go through the policy book, see if we can figure it out. – CSO

In terms of support, I would definitely say my manager. I have had to pull him in a few times, more as my support person, and a bit of a mediator. – CSO

I had a client who had always gone really well, then one time she came in angry and yelling and swearing. I reached out to my supervisor so she could call the client and see if it was something I did which caused it that we could fix, or if it wasn't anything I did, whether she was going to continue to react like this. And it really helped. My supervisor went through everything with her, made sure she understood, but also told her that you can't treat our employees like that, because there is zero tolerance for abuse. She let her know what the expectations were for her behavior. That really helped, and things with the client have gone really well since then. It also made me feel I can trust my supervisor to support me. – CSO

As regional manager, I have a lot of support and I really appreciate that, with the regional superintendent and the Income Security team in headquarters. And I can reach out to the other regional managers. Talking through challenges with me, or situations that might come up – trying to be proactive rather than reacting. – Regional manager

HQ is very good at helping with questions…If I call and say this is the scenario, please help me – someone is going to get back to me right away. – Regional manager

Analysis and Findings

Does ECE have a fair process for resolving complaints about service delivery from income assistance clients?

A fair complaints process needs to address efficiency, accountability, and responsiveness. On the one hand, clients need to have their concerns resolved as quickly as possible. When that happens it reduces clients' frustration and frees up staff time for other tasks. On the other hand, the Department needs to have an overall sense of what kinds of concerns come up and how often in order to monitor service quality and make appropriate improvements over time. The Department also needs a way to track whether concerns are actually being resolved. The IA clients who have made complaints to our Office have usually tried to resolve the situation with their CSO and/or regional management first, and felt they were not taken seriously or that no one was responding.

For a complaints process to be fair it also needs to be accessible to a diverse range of clients. This includes having plain language information about the complaints process in print materials and on the website. A formal process is not necessarily a better one if it creates barriers.

The informal complaint resolution process that was in place up until April 2022 put the primary responsibility for resolving concerns with the regional office, with the possibility of escalating a complaint through management and headquarters. Although staff seemed to be aware of the steps in that process, clients may not have been. This might have contributed to some clients going directly to the Minister's office or to their MLA if they were frustrated with their CSO.

We did not discuss the client concern process that was introduced in April 2022 with most staff as it was too new. However, we made the following observations:

- the new form should allow ECE to better track some kinds of concerns, especially related to timelines;
- the form may be difficult for some clients to complete and submit on their own;
- the form only includes some of ECE's service standards and focuses heavily on timelines – it does not for example include the Department-wide service standards about welcoming people and treating them with respect and integrity, and staff having the skills, knowledge and abilities to provide quality service; while there is space for additional concerns, a client who, for example, feels they did not receive accurate program information from the CSO might be unsure of where to take their concern;
- there is no information on the form or companion document to explain context such as who will review the concern and by when, and what kinds of concerns the form is appropriate for (as distinct, for example from the Social Assistance Appeals process);

- the role of CSOs and regional offices in the new process is unclear: for example, it is unclear whether clients will still be encouraged to first take concerns to their CSO and/or regional manager, and what will happen once headquarters receives a complaint;
- it is unclear whether there are sufficient resources to administer the new process; and
- the new process may be overkill for client concerns that are really about misunderstandings of policies and standards and could be corrected with additional explanation – for example, clients who believe their CSO did not meet the 2-day standard to respond to their application because they did not realize the 2-day period only starts once they have submitted all of their documents.

Finding #1

The client concern form and process that was introduced in April 2022 should allow for better monitoring and tracking of client concerns, but may not be accessible to some IA clients, is lacking upfront plain language information about the process and what happens to complaints once they are sent in, and depending on how it is implemented, risks leading to more delays and workload in resolving client concerns.

Does ECE foster a culture of ongoing quality review and continuous service improvement in the processes clients go through to access income assistance and in meeting its own service standards?

For quality review and continuous service improvement to be possible, authorities and clients need to know what they are committed to delivering and have a way to measure how well they are living up to those commitments. Both quantitative and qualitative standards and measures are important.

ECE demonstrates accountability and transparency by having clear standards for both the Department as a whole and for the IA program. Staff are aware of the standards and their importance, although many expressed challenges in being able to meet them due to workload pressures (see discussion in the next session). Clients are aware of the IA standards and particularly the timelines but may not be as aware of the Department-wide standards, which address important qualitative issues such as welcoming people and treating them with respect and integrity, and staff having the skills, knowledge and abilities to provide quality service.

ECE has recognized performance measurement as an area needing improvement, and is working on an overall performance measure plan for the IA program, as indicated in the January 2022 discussion paper.

Finding #2

ECE has clear service standards and is working on improving performance measurement for the IA program. Quantitative standards may be receiving more emphasis in client messaging and tracking than qualitative standards.

Does ECE ensure income assistance staff are appropriately trained and supported to provide people-centred services to income assistance clients in an impartial manner?

Supporting staff to provide people-centred services includes training and professional development, workload management, and setting clear expectations and appropriate levels of discretion. Staff also need to be supported to look after their own well-being and to manage workplace stress.

Training and professional development for people-centred services

Staff come with different backgrounds and experiences and have different levels of proficiency and comfort with "soft skills" important to people-centred service such as conflict resolution, relationship building, and plain language communication. ECE has a number of mandatory trainings such as the Certified Service Professional program, motivational interviewing, and non-violent crisis intervention that support development of these skills. Some staff told us they had also received excellent training and experience in one or more of these areas in their previous workplaces and felt they had the skills they needed. Others said they would benefit from more training in specific areas such as working with people with disabilities, or conflict resolution that is aimed at ongoing relationships as opposed to one-time situations. ECE has identified trauma-informed service training as a priority and plans to offer the training at an in-person conference this year.

Many staff spoke positively about the training and informal networking at the in-person conferences that took place up until the COVID-19 pandemic. Some staff joined the Department in 2020 or later and have not yet had the opportunity to attend. ECE advised that they plan to host a territorial conference in spring of 2023.

Finding #3

ECE provides training and professional development opportunities that support people-centred services and has prioritized trauma-informed service training in the short-term. ECE could enhance staff skills in a few key areas, for example, by offering complaint and conflict resolution training more specifically tailored to CSOs' and regional managers' roles, and communications training specifically tailored to helping clients with disabilities or other challenges that affect their understanding of the program.

Workload

For staff to be able to meet service standards and provide people-centred service, they need to have reasonable workloads. We heard with a great deal of concern that this is not the case for most staff. The issue was not limited to one or two regions but was territory-wide. Factors that influence staff workloads include the number of clients assigned to each CSO; urgent requests for BFs; lack of administrative support; client needs for information and assistance to gather documents and meet other program requirements; service standard expectations; and training and professional development.

ECE is currently considering a number of changes to the IA program, as well as to its overall program goal. Some of these changes could affect workloads if, for example, requirements for clients to access the program are reduced in some situations or if data tracking and reporting requirements increase to support performance measurement.

Finding #4

Many IA staff do not currently have sustainable workloads that would allow them to provide people-centred service while still meeting timeline standards, responding to headquarters requests, completing administrative tasks, and training and professional development. ECE is considering significant program changes that could impact workloads either positively or negatively.

Clarity of Expectations

For staff to be able to manage priorities and to make judgment calls in day to day dealings with clients, they need to have clear expectations from ECE. Program standards are one way ECE sets expectations. Other expectations are found in program goal statements, the Code of Ethics, job descriptions, and policies and regulations.

ECE has identified a lack of common understanding about what the program goal of self-reliance means and how it should be implemented. Our investigation supports this conclusion. We observed, for example, that staff had different views on how much assistance to give to clients needing help with program requirements such as getting documents from third parties. ECE is contemplating a significantly changed program goal.

The Code of Ethics sets clear expectations and procedures for identifying and managing conflicts of interest. We observed that staff understood these measures, found them helpful, and did not have difficulty complying with them. A few staff in smaller communities had different views on how to handle information they became aware of outside of work, e.g. through social media or personal conversations, that could impact client eligibility.

Program policies and regulations leave little discretion for staff to accommodate clients who clearly meet program criteria but have difficulty complying with requirements, to take into account extreme circumstances and hardships, and to correct mistakes, such as when a CSO forgets to tell a client about a benefit or loses a document. Some staff felt that this strictness got in the way of people-centred service.

CSO job descriptions have not been substantially revised in over a decade, contain dated terminology such as "service management approach," and emphasize administrative and program delivery tasks with little attention to conflict resolution, relationship building, accessible communication, and other people-centred service responsibilities. Existing staff, potential hires, and job evaluators may get the message that people-centred service is a relatively minor part of the CSO role. The sample of performance appraisals we reviewed also suggests more of an emphasis on policy and regulatory compliance and administrative tasks from management, although we did note a few objectives around communications and client relationships.

Finding #5

ECE currently sets conflicting expectations for staff through its standards, program goals, job descriptions, and policies and regulations, which impairs ECE's ability to provide consistent people-centred service.

Finding #6

ECE supports its staff to provide service in an impartial manner by setting clear expectations and procedures for identifying and managing conflicts of interest. Staff may need clearer guidance on how to handle client information they become aware of from sources outside the workplace.

Support for staff well-being and stress management

Staff who experience significant workplace stress and/or do not have opportunities to look after their own well-being, for example, by using their leave entitlements, make more mistakes, have a harder time managing their reactions to clients who are aggressive or upset, and are at risk of burnout and leaving their jobs, which increases the burden on those who stay.

The IA program has inherent stressors for staff who interact directly with clients, including sometimes having to say “no” to people in need, and navigating between professional role and personal life, especially in smaller communities. However, we observed a level of workplace stress among some staff that went beyond what could be reasonably expected, and that should never be normalized. Several staff were brought to tears when speaking about their stress levels and well-being during our interviews.

We heard that workload was the most common factor affecting workplace stress and staff well-being. Other factors we heard were safety concerns, particularly in smaller communities where CSOs work alone, lack of relief support and not being able to take leave, abuse and harassment from clients both inside and outside the workplace, and feeling that while they constantly hear about complaints, success and good work are not recognized or acknowledged.

Both headquarters and regional managers also voiced concerns about staff stress and well-being, and at least one felt that the GNWT’s EFAP was not adequate to support their staff.

We recognize there are limits to what management can do to address issues outside of the workplace, such as client comments on social media or harassment in the community. However, there are factors within ECE’s control, such as addressing workload issues, providing enhanced counselling and stress management support, supporting managers to set expectations with clients about how they treat staff, identifying and mitigating safety concerns, and finding ways to more often acknowledge staff for their efforts and successes.

Finding #7

ECE is not currently providing enough support for IA staff well-being and stress management, which impairs ECE’s ability to provide people-centred service.

Recommendations

1. It is recommended that by March 31, 2023, ECE evaluate whether its new client concern process is achieving efficiency, accountability and responsiveness in resolving client concerns, and if necessary, identify appropriate changes.

2. It is recommended that by March 31, 2023, ECE clarify for staff and clients the process and standards for its new client concern process, including whose responsibility it is to respond to concerns, and by when.

3. It is recommended that by March 31, 2023, ECE identify and offer to clients an alternative to the Client Concern Form that allows clients to voice concerns that will be tracked, without requiring them to fill out a form themselves, and/or to have access to email and/or fax, or to rely on postal service to be able to submit the form.

4. It is recommended that by March 31, 2023, ECE produce a plain language document available in print and online that explains the process for voicing a concern about service delivery issues, and that clearly shows which matters are appropriate for that process and which matters can be appealed.

5. It is recommended that by March 31, 2023, ECE modify its Client Concern Form to make specific mention of at least some qualitative standards such as staff being knowledgeable and providing respectful service and make the Department-wide standards available to clients in all regional offices.

6. It is recommended that ECE include measures of qualitative as well as quantitative standards for IA services in its performance management plan.

7. It is recommended that by March 31, 2023, ECE develop a plan for additional training tailored to CSOs and regional managers' roles to support people-centred service in areas including accessible communication and conflict resolution.

8. It is recommended that as part of the planning for changes to the IA program, ECE revisit current staffing levels to ensure reasonable workloads, factoring in time required for client service including for clients with complex needs, meeting IA and Departmental standards, administrative tasks, responding to client concerns and BF requests, employee leave, and training and professional development.

9. It is recommended that as part of the planning for changes to the IA program, ECE revise job descriptions to ensure they adequately reflect client service-related responsibilities and working conditions.

10. It is recommended that as part of the planning for changes to the IA program, ECE consider changes to allow staff more discretion in specific situations, such as when a client has failed to meet an administrative requirement by a specific deadline while having otherwise clearly demonstrated need and eligibility, and when approval by a regional manager may be sufficient rather than requiring Director approval.

11. It is recommended that by March 31, 2023, ECE develop a plan to better support staff well-being and stress management and identify and begin implementing measures within its control as soon as possible.

Conclusion

It is in the nature of ombuds reports to focus on what is not working and to make recommendations for improvements. However, as noted in some of the staff comments quoted above, the IA program does have many strengths and examples of best practices, especially in the areas of relationship building, communicating with clients, and internal support between colleagues. It is important not to lose sight of this larger context, and of what is working well.

We also feel it is important to reflect that regardless of any frustrations, challenges and differences of opinion about how the program should work, it was clear to us that every single person we interviewed cared deeply about clients and wanted the best outcome for them.

Appendix A

Response from Education, Culture & Employment

September 22, 2022

VIA EMAIL

Ms. Colette Langlois
Ombud, Northwest Territories Ombud
5-6 Courtoreille Street
PO BOX 4297
HAY RIVER NT X1A 1G5

Dear Ms. Langlois:

Income Assistance Program

Thank you for providing the final report regarding the Income Assistance (IA) Program with respect to how we manage service complaints, quality service, and training for staff dated September 01, 2022.

The Department of Education, Culture and Employment (ECE) has reviewed the final report and is pleased to advise that we accept all 11 recommendations, and that work has already begun on several of the recommendations, including recommendation 5, updating the Client Concern Form which is expected to be completed by January 2023.

As noted, ECE is currently completing a review of the IA program and is tasked with developing a new program for Seniors and Persons with Disabilities. It is expected that these program changes will be in place by the Summer of 2023. As a number of the recommendations are connected to the completion of the IA program review, ECE can commit to addressing all recommendations by September 2023.

We appreciate the time you have spent with our staff and look forward to the improvements that your recommendations will have on our programs.

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Should you have any questions, please contact our office at 1-866-973-7252 or visit www.ece.gov.nt.ca/en/services/income-security-programs.

Sincerely,

R.J. Simpson
Minister, Education, Culture
and Employment

c. John MacDonald
Deputy Minister
Education, Culture and Employment